

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PREMIER ELECTRONICS, L.L.C.,
Plaintiff

v.

ADT, L.L.C.,
Defendant

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CIVIL ACTION NO. 3:17-cv-03060-m

**SECOND AGREED MOTION TO EXTEND DEADLINE
TO SERVE INITIAL DISCLOSURES**

Premier Electronics, L.L.C. (“Plaintiff”) and ADT, L.L.C. (“Defendant”) (collectively, the “Parties”) file this Second Agreed Motion to Extend Deadline to Serve Initial Disclosures and respectfully shows the Court as follows:

I.

1. Plaintiff filed its Original Petition in state court on October 10, 2017. *See* Dkt. 1, Ex. A. Defendant filed a Notice of Removal on November 6, 2017. *See* Dkt. 1.

2. On December 7, 2017, the Court ordered the Parties to file a Joint Report by December 28, 2017. *See* Dkt. 11. The Parties complied and filed the Joint Status Report on the due date. *See* Dkt. 12.

3. As part of the Joint Status Report, the Parties agreed to exchange Initial Disclosures on or before February 2, 2018. *See* Dkt. 12.

4. On February 2, 2018, the parties filed an Agreed Motion to Extend Deadline to Serve Initial Disclosures, which the Court granted on February 8, 2018. *See* Dkts. 14 and 15, respectively.

5. The parties are actively conferring on a Confidentiality and Protective Order and request an additional extension of time, until March 2, 2018, in which to exchange Initial

Disclosures. The requested extension will not delay deadlines ordered by the Court in the Scheduling Order (Dkt. 13).

II.

6. This extension is requested not for delay only but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Premier Electronics, L.L.C. and Defendant ADT, L.L.C., respectfully request the Court grant the extension to serve Initial Disclosures, and for such other and further relief as to which the Parties may show themselves to be justly entitled.

Respectfully submitted,

/s/ Shannon Beck

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AGREED:

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**Signed with Permission*

**ATTORNEY FOR DEFENDANT
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been furnished to the following counsel in accordance with the Federal Rules of Civil Procedure, this 16th day of February, 2018.

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